



LT Environmental, Inc.
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Arvada, Colorado 80003
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Colorado

January 11, 2019

Ms. Alexis North
Office of Enforcement, Compliance & Environmental Justice
EPA Region 8
1595 Wynkoop Street (8ENF-AT)
Denver, CO 80202-1129

RECEIVED

JAN 30 2019

Office of Enforcement, Compliance
and Environmental Justice

**RE: NSPS Subpart OOOOa Annual Report
Cub Creek Energy**

Dear Ms. North,

LT Environmental, Inc. (LTE) is submitting on behalf of Cub Creek Energy the attached initial report for NSPS Subpart OOOOa for the November 9, 2017 through November 8, 2018 reporting period for the Vail Pad, and January 1, 2018 through December 31, 2018 reporting year for the Markham Pad. This package includes the appropriate portions of the EPA provided reporting template, as well as a signed certification of completeness by a responsible official.

Please feel free to contact me at 303-704-1066 or cdimarco@ltenv.com if you have questions.

Sincerely,

LT ENVIRONMENTAL, INC.

(b) (6)

Chris DiMarco
Project Air Quality Scientist

cc: Tracy Butzen – Cub Creek Energy



Responsible Official

Name: (Last) Huckabee (First) Jared (MI) _____

Title Vice President of Operations

Street or P.O. Box 200 Plaza Dr. #100

City Highlands Ranch State CO ZIP 80129 - _____

Telephone (303) 446 - 6140 Ext. _____ Facsimile () - _____

Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

(b) (6)

Name (typed) _____

Jared Huckabee

Date: _____

1 / 10 / 2019

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5426a(f) Annual Report
For each affected facility, an owner or operator must include the information specified in paragraphs (b)(1)(i) through (b) of this section in all annual reports.

The asterisk (*) next to each field indicates that the corresponding field is required.

| Facility Record No. * (Field value will automatically generate if a value is not entered.) | SITE INFORMATION | | | | | | | | | | ALTERNATIVE ADDRESS INFORMATION (if NO PHYSICAL ADDRESS AVAILABLE FOR SITE *) | | | REPORTING INFORMATION | | PE Certification | ADDITIONAL INFORMATION | |
|---|------------------------------------|--|--|--|----------------|--------------------|----------|----------------------|---|--|---|---|--|--|---|--|--|---------------------------------------|
| | Company Name * (60.5426a(1)(3)) | Facility Site Name * (60.5426a(1)(3)) | US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (60.5426a(1)(3)) | Address of Affected Facility * (60.5426a(1)(3)) | Address 2 | City * | County * | State Abbreviation * | Zip Code * | Responsible Agency Facility ID (State Facility Identifier) | Description of Site Location (60.5426a(1)(3)) | Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (60.5426a(1)(3)) | Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (60.5426a(1)(3)) | Beginning Date of Reporting Period * (60.5426a(1)(3)) | Ending Date of Reporting Period * (60.5426a(1)(3)) | Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (60.5426a(1)(2)) Please provide only one file per record. | Please enter any additional information. | Enter associated file name reference. |
| e.g.: ABC Company | e.g.: XYZ Compression Station | e.g.: 12 345-6789-12 | e.g.: 123 Main Street | e.g.: Suite 100 | e.g.: Brooklyn | e.g.: Kings County | e.g.: NY | e.g.: 11221 | e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456 | e.g.: 34.52345 | e.g.: -101.57345 | e.g.: 1/1/2015 | e.g.: 12/31/2015 | e.g.: Certification.pdf or XYZCompression.pdf | e.g.: additional report or XYZCompression.pdf | | | |
| 1. Cab Creek Energy | Valdell | N/A | N/A | SWNW Sec. 12 T4N R6W | Arrestoon | Weld | CO | 80534 | 123-991C | | 3 miles from Arrestoon on Hwy 1 | | | 11/5/2017 | 11/8/2018 | | | |
| 2. Cab Creek Energy | Marham Pad | N/A | N/A | NWSE Sec. 12 T4N R6W | Berthoud | Weld | CO | 80523 | 123-994B | | 2 miles east of I-25 and county rd | | | 3/1/2018 | 12/31/2018 | | | |

(b) (9)

For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, an owner or operator must include the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (x) of this section in all annual reports.

The asterisk (*) next to each field indicates that the corresponding field is required.

| Facility Record No. * (Excerpt from drop-down list - owner need to scroll for *) | Identification of Each Affected Facility * (605.543(a)(3)(i)) | Date of Survey * (605.543(a)(3)(ii)) | Survey Begin Time * (605.543(a)(3)(iii)) | Survey End Time * (605.543(a)(3)(iv)) | Name of Surveyor * (605.543(a)(3)(v)) | Ambient Temperature During Survey * (605.543(a)(3)(vi)) | Sky Conditions During Survey * (605.543(a)(3)(vii)) | Maximum Wind Speed During Survey * (605.543(a)(3)(viii)) | Monitoring Instrument Used * (605.543(a)(3)(ix)) | Deviation From Monitoring Plan (If none, state none.) * (605.543(a)(3)(x)) | Type of Component for which Fugitive Emissions Detected * (605.543(a)(3)(xi)) | Number of Each Component Type for which Fugitive Emissions Detected * (605.543(a)(3)(xii)) | Type of Component Not Required as Required in (605.543(a)(3)(xi)) * (605.543(a)(3)(xiii)) | Number of Each Component Type Not Required as Required in (605.543(a)(3)(xi)) * (605.543(a)(3)(xiv)) |
|---|--|---|---|--|--|---|---|--|--|--|---|---|--|---|
| e.g.: Well Site ABC | e.g.: 8/15/17 | e.g.: 10:00 am | e.g.: 1:00 pm | e.g.: John Smith | e.g.: 90°F | e.g.: Sunny, no clouds | e.g.: 2 mph | e.g.: Company RSC optical gas imaging camera | e.g.: None | e.g.: Value | e.g.: 2 | e.g.: Value | e.g.: 1 | e.g.: 1 |
| 1 Well Pad | | 5/6/2018 | 2:29 PM | 5:11 PM Mark Losenicki | 70°F | Clear | 4 mph | FLIR D32 Camera | None | Value | 2 | Value | N/A | N/A |
| 1 Well Pad | | 5/6/2018 | 2:29 PM | 5:11 PM Mark Losenicki | 70°F | Clear | 4 mph | FLIR D32 Camera | None | Connector | 1 | N/A | N/A | N/A |
| 1 Well Pad | | 5/6/2018 | 2:29 PM | 5:11 PM Mark Losenicki | 70°F | Clear | 4 mph | FLIR D32 Camera | None | Thief Hatch | 1 | N/A | N/A | N/A |
| 1 Well Pad | | 9/14/2018 | 11:05 AM | 12:30 PM Mark Losenicki | 81°F | Clear | 4 mph | FLIR D32 Camera | None | Valve | 2 | N/A | N/A | N/A |
| 1 Well Pad | | 9/14/2018 | 11:05 AM | 12:30 PM Mark Losenicki | 81°F | Clear | 4 mph | FLIR D32 Camera | None | Thief Hatch | 1 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 9/15/2018 | 11:34 AM | 12:35 PM Mark Losenicki | 80°F | Clear | 6 mph | FLIR D32 Camera | None | Valve | 1 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 9/15/2018 | 11:34 AM | 12:35 PM Mark Losenicki | 80°F | Clear | 6 mph | FLIR D32 Camera | None | Connector | 1 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 9/15/2018 | 11:34 AM | 12:35 PM Mark Losenicki | 80°F | Clear | 6 mph | FLIR D32 Camera | None | Pressure Regulator | 1 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 9/15/2018 | 11:34 AM | 12:35 PM Mark Losenicki | 80°F | Clear | 6 mph | FLIR D32 Camera | None | Thief Hatch | 2 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 12/17/2018 | 11:05 AM | 12:17 PM Mark Losenicki | 51°F | Partly Cloudy | 2 mph | FLIR D32 Camera | None | Valve | 5 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 12/17/2018 | 11:05 AM | 12:17 PM Mark Losenicki | 51°F | Partly Cloudy | 2 mph | FLIR D32 Camera | None | Connector | 1 | N/A | N/A | N/A |
| 2 Manifolds Pad | | 12/17/2018 | 11:05 AM | 12:17 PM Mark Losenicki | 51°F | Partly Cloudy | 2 mph | FLIR D32 Camera | None | Thief Hatch | 2 | N/A | N/A | N/A |

| | | | | | | | | | OGI | | Compressor Station Affected Facility Only | |
|---|---|--|---|--|---|--|---|--|--|---|--|--|
| Type of Difficult-to-Monitor Components Monitored * | Monitor of Each Difficult-to-Monitor Component Type Monitored * | Type of Difficult-to-Monitor Component Monitored * | Monitor of Each Difficult-to-Monitor Component Type Monitored * | Date of Successful Repair of Pipeline Encroachment Component * | Type of Component Placed on Delay of Repair * | Monitor of Each Component Type Placed on Delay of Repair * | Explanation for Delay of Repair * | Type of Instrument Used to Measure Repair Completion Not Required During Original Survey * | Training and Experience of Surveyor * | Was a monitoring survey performed under § 80.109(a)(2)(i) * | If a monitoring survey was not performed, the quarterly monitoring period for which the monitoring survey was required * | |
| (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | (§80.143(a)(4)(7)(a)) | |
| e.g.: None | e.g.: I | e.g.: None | e.g.: I | e.g.: 12/30/2018 | e.g.: None | e.g.: I | e.g.: Unable to repair until next condition | e.g.: Company ABC optical gas imaging camera | e.g.: Trained Photogrammetrist, completed 80-hour course at NYCT Training Center. Has 10 years of experience with OGI surveys. | e.g.: Yes | e.g.: January, February and March | |
| N/A | N/A | N/A | N/A | 5/8/2018, 5/9/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 5/8/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 5/8/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/14/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/14/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/15/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/15/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/15/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 6/15/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 12/17/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 12/17/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |
| N/A | N/A | N/A | N/A | 12/17/2018 | N/A | N/A | N/A | FLIR OGI Camera | 2+ years of leak detection and repair field experience | No | N/A | |

AS 296 Part 10 - Standards of Performance for Grade 10 and Higher Gas Facilities for which Construction, Installation or Reconstruction Commenced After September 18, 2012 - AS 296(10)10 Initial Report
For each pneumatic pump emission facility, at least one emission must include the information specified in paragraphs (a)(6)(i) through (ii) of this section in all annual reports.

The owner (TS) must to each 1000 emissions that the corresponding table is required.

| Pneumatic Pump Emissions: Report that have a Change in Reported Condition During the Reporting Period | | | Pneumatic Pump Emissions: Report that have a Change in Reported Condition During the Reporting Period | | | Pneumatic Pump Emissions: Report that have a Change in Reported Condition During the Reporting Period | | |
|---|--|---|---|---|---|---|---|--|
| Table Record No. * (added from Amendment to the AS 296(10)10) | Description of Each Pump * (AS 296(10)10) | Was the pneumatic pump constructed, modified, or reconstructed during the reporting period? * (AS 296(10)10) | Which condition does the pneumatic pump meet? * (AS 296(10)10) | If your table emissions in a control device and the control device is designed to achieve a 95% particulate reduction, specify the particulate reduction. * (AS 296(10)10) | Identification of Each Pump * (AS 296(10)10) | Have previously reported? * (AS 296(10)10) | Which condition does the pneumatic pump meet? * (AS 296(10)10) | If your table emissions in a control device and the control device is designed to achieve a 95% particulate reduction, specify the particulate reduction. * (AS 296(10)10) and (AS 296(10)10) |
| e.g. Pump (2 or 3) e.g. modified | | | e.g. particulate emissions are controlled by a control device or process | e.g. 95% | e.g. Pump (2 or 3) | e.g. AS 296(10) | e.g. Control device emissions are controlled by a control device or process | e.g. 95% |
| 1. Pump (2) | Controlled | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. | | | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. |
| 2. Pump (3) | Controlled | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. | | | Emissions from pneumatic pump are routed to a control device. | Emissions from pneumatic pump are routed to a control device. |

Tracy Butzen

From: Tracy Butzen
Sent: Friday, January 11, 2019 3:28 PM
To: 'Alexis North'
Cc: Chris DiMarco
Subject: Cub Creek Energy, LLC - OOOOa Annual Report - Vail and Markham pads
Attachments: Vail and Markham_Part 60 Subpart OOOOa - 60.5420a(b) Annual Report - Cub Creek signed.pdf

Ms. North,

Attached please find a copy of Cub Creek Energy, LLC's OOOOa Annual Report for the Vail and Markham Pads. I tried to hand deliver this report, unfortunately however, due to the current federal shutdown situation I was not able to drop the report off as security informed me that they could not accept the delivery, there was no dropbox I could place it in, and no EPA employee that was in the office to accept any mail. I will still send an original copy in the mail, but I hope the electronic delivery will suffice due to the current federal shutdown.

I hope the whole shutdown situation gets resolved soon.

If you have any questions, please let me know.

Thanks,

Tracy Butzen

Tracy Butzen
Cub Creek Energy, LLC
200 Plaza Drive, Suite 100
Highlands Ranch, CO 80129

(b) (6)

tracy.butzen@cub-creek.com